

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE  SANDRA MARIA DE FATIMA SEDA BARLETTA  Debtor	CASE NO. 19-02177(MCF)  CHAPTER 13
--	--

**URGENT MOTION REQUESTING ENTRY OF ORDER**

**TO THE HONORABLE COURT:**

By counsel, secured creditor Isabel de la Torre - Machado very respectfully represent and pray as follows:

1. On February 22, 2021 an order authorizing the appearing party to conduct an expedited discovery directed to inspect and appraise its collateral was requested at Dk. No. 79.
2. In the aforementioned motion requesting the authorization of expedited discovery a shortened period of five (5) days to object to the same was also requested. Dk. No. 79.
3. As of today, the shortened time to object has elapsed without any objection to the requested expedited discovery being filed.
4. As per the foregoing, it is hereby requested from this Honorable Court to enter an order approving the expedited discovery request at Dk. No. 79 and ordering Debtor to cooperate with the same so said discovery can be conducted on the scheduled date of March 11, 2021 at 9:00 am.

5. The aforementioned order was requested, due to Debtor's failure to voluntarily grant access to the appearing creditor's collateral, so the retained appraisers could conduct the desired inspection and appraisal.
6. The need for an expedited order is explained at Dk. No. 79, thus necessitating the issuance of an order before the date slated to conduct the requested expedited discovery and due to Debtor's resistance in voluntarily allowing access to the appearing creditor's collateral to conduct the desired discovery in time for the hearing on confirmation scheduled for April 6, 2021 at 9:00 am.

**WHEREFORE**, it is respectfully requested from this Honorable Court to **GRANT** this motion and proceed to enter an order approving expedited discovery request at Dk. No. 79 and issuing an order directed to Debtor to cooperate with said discovery by granting access to the appearing creditor's collateral, with any other redress this Court may deem just and proper.

**CERTIFICATE OF SERVICE:** This document was filed with the U.S. Bankruptcy Court for the District of Puerto Rico using the CM/ECF filing system, which will send a copy of this motion to all registered parties including: **Noemí Landrau - Rivera, Esq.**, Counsel for Debtor, **Alejandro Oliveras - Rivera, Esq.**, Chapter 13 Trustee, and to the **U.S. Trustee Office**. A copy of this document was also sent by First Class Mail to **Sandra María de Fatima Seda Barletta**, Debtor, #8 Calle Tapia, Ocean Park, San Juan, Puerto Rico 00911 and to all creditors and parties in interest as per the attached master address list.

**RESPECTFULLY SUBMITTED.**

In Guaynabo, Puerto Rico on this 5<sup>th</sup> day of March 2021.

**LUIS M. SUAREZ LOZADA  
LAW OFFICES**

Counsel for Isabel de la Torre - Machado  
P.O. Box 192333  
San Juan, Puerto Rico 00919-2333  
Phone:(787)296-4299  
e-mail: [suarez@caribe.net](mailto:suarez@caribe.net)  
**/S/Luis M. Suárez Lozada**  
USDC-PR 209712

Label Matrix for local noticing  
0104-3  
Case 19-02177-MCF13  
District of Puerto Rico  
Old San Juan  
Mon Sep 14 12:20:45 AST 2020

BANCO POPULAR PR - SPECIAL LOANS  
PO BOX 362708  
SAN JUAN, PR 00936-2708

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

AURORA BANK FSB  
2617 COLLEGE PARK  
Scottsbluff, NE 69361-2294

AUTORIDAD DE ACUEDUCTOS  
Y ALCANTARILLADOS  
P.O. BOX 70101  
SAN JUAN, PR 00936-8101

BANCO POPULAR DE PUERTO RICO  
SPECIAL LOANS  
PO BOX 362708  
SAN JUAN, PR 00936-2708

BANCO SANTANDER  
PO BOX 362589  
SAN JUAN, PR 00936-2589

Banco Popular de Puerto Rico  
Special Loans Department (749)  
PO Box 362708  
San Juan, PR 00936-2708

CRIM  
PO BOX 195387  
SAN JUAN, PR 00919-5387

DEPARTMENT OF TREASURY  
BANKRUPTCY SECTION 424 B  
PO BOX 9024140  
SAN JUAN, PR 00902-4140

FANNIE MAE  
3900 WISCONSIN AVENUE  
NW WASHINGTON  
Washington, DC 20016-2806

INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATION  
PO BOX 7346  
PHILADELPHIA, PA 19101-7346

ISABEL DE LA TORRE MACHADO  
H3 CONDOMINIO MEADOWS TOWER APT. 6A  
AVENIDA SAN PATRICIO  
GUAYNABO, PR 00968

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

LIC. ANTONIO HERNANDEZ ALMODOVAR  
RIVERA-MUNICH & HERNANDEZ LAW OFFICES  
PO BOX 364908  
San Juan, PR 00936-4908

LIC. IDALIA N. LEON LANDRAU  
PO BOX 7531  
Caguas, PR 00726-7531

LIC. JULIO NIGAGLIONI ARRACHE  
URB. RIBERAS DEL RIO  
CALLE 7 D-1  
Bayamon, PR 00959-8820

MIDLAND FUNDING  
PO BOX 268941  
Oklahoma City, OK 73126-8941

RIVERA MUNICH & HERNANDEZ LAW OFFICES PSC  
PO BOX 364908  
SAN JUAN PR 00936-4908

RIVERA MUNICH, ELIZA & HERNANDEZ  
PO BOX 364908  
San Juan, PR 00936-4908

SMALL BUSINESS ADMINISTRATION  
2120 RIVERFRONT DRIVE SUITE 100  
LITTLE ROCK, AR 72202-1794

Synchrony Bank  
c/o of PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

US Department of Education  
PO Box 16448  
Saint Paul, MN 55116-0448

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

ISABEL DE LA TORRE -MACHADO  
H3 CONDOMINIO MEADOWS TOWER APT. 6A  
GUAYNABO, PR 00968

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

NOEMI LANDRAU RIVERA  
PO BOX 270219  
SAN JUAN, PR 00928-3019

SANDRA MARIA DE FATIMA SEDA BARLETTA  
8 CALLE TAPIA  
OCEAN PARK  
SAN JUAN, PR 00911-1442

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

JEFFERSON CAPITAL SYSTEMS, LLC  
PO BOX 7999  
Saint Cloud, MN 56302-9617

(d)Jefferson Capital Systems LLC  
Po Box 7999  
Saint Cloud Mn 56302-9617

End of Label Matrix	
Mailable recipients	27
Bypassed recipients	0
Total	27